

## REMARKS

Claims 1-32 are pending.

### 103(a) Rejections

Claims 1-2, 4-9, 11-12, 14-22, 24-25, 27 and 29-32 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Maruyama et al. ("Maruyama;" US 6,385,389) in view of Taira et al. ("Taira '189;" US 6,167,189). The Applicant has reviewed these references and respectfully submits that the present invention as recited in Claims 1-2, 4-9, 11-12, 14-22, 24-25, 27 and 29-32 is not anticipated nor rendered obvious by Maruyama and Taira '189, alone or in combination.

Applicant respectfully directs the Examiner to independent Claims 1, 15 and 27. Claims 2, 4-9, 11-12 and 14 are dependent on Claim 1, Claims 16-22 and 24-25 are dependent on Claim 15, and Claims 29-32 are dependent on Claim 27, and recite additional features of the present claimed invention.

Claim 1 recites that an embodiment of the present invention is directed to a method for organizing and accessing stored data representing audio and visual data in a mass storage device, wherein an object associated with stored data is assigned a unique object identifier, "wherein said unique object identifier is unique across a plurality of mass storage devices." Independent Claim 15 recites that an embodiment of the present invention is directed to a mass storage unit comprising a microcontroller used for assigning a unique object identifier to an object associated with data, "wherein said unique object identifier is unique across a plurality of mass storage units." Independent Claim 27 recites that an embodiment of the present invention is directed to a mass storage unit comprising

a microcontroller means used for assigning a unique object identifier to an object associated with data, "wherein said unique object identifier is unique across a plurality of mass storage units." The Examiner is also respectfully directed to page 18 of the instant specification, beginning at line 20 and continuing through line 19 on page 19.

Maruyama does not show or suggest an object identifier that is unique across a plurality of mass storage units (or devices) as recited in independent Claims 1, 15 and 27. Applicant understands Maruyama to only show assigning identification numbers to cells on an information recording medium (e.g., an optical disk). According to Maruyama, cells are assigned identification numbers such as C\_IDN#j. Consequently, according to Maruyama, and in contrast to the present claimed invention, a cell on one optical disk and a cell on another optical disk can have the same identification number. Applicants respectfully note that a mass storage unit (or device) according to the present claimed invention is quite different from a cell such as that described by Maruyama. Applicants respectfully submit that uniquely identifying a cell within a single optical disk is quite different from uniquely identifying an object across a plurality of mass storage units (or devices).

Therefore, Applicant respectfully submits that Maruyama does not show or suggest a unique object identifier that is unique across a plurality of mass storage units (or devices) as recited by independent Claims 1, 15 and 27. Applicant also submits that Maruyama does not show the additional claimed features recited by Claims 2, 4-9, 11-12 and 14 dependent on Claim 1, Claims 16-22 and 24-25 dependent on Claim 15, and Claims 29-32 dependent on Claim 27.

Taira '189 does not overcome the shortcomings of Maruyama. Applicant respectfully submits that Taira '189, alone or in combination with Maruyama, does not show or suggest a method for organizing and accessing stored data representing audio and visual data in a mass storage device, wherein an object associated with stored data is assigned a unique object identifier, "wherein said unique object identifier is unique across a plurality of mass storage devices," as recited in independent Claim 1. Applicant also respectfully submits that Taira '189, alone or in combination with Maruyama, does not show or suggest a mass storage unit comprising a microcontroller used for assigning a unique object identifier to an object associated with data, "wherein said unique object identifier is unique across a plurality of mass storage units" as recited in independent Claim 15. In addition, Applicant respectfully submits that Taira '189, alone or in combination with Maruyama, does not show or suggest a mass storage unit comprising a microcontroller means used for assigning a unique object identifier to an object associated with data, "wherein said unique object identifier is unique across a plurality of mass storage units," as recited in independent Claim 27.

Thus, Applicant respectfully submits that Maruyama and Taira '189, alone or in combination, do not show or suggest the present claimed invention as recited by independent Claims 1, 15 and 27, and that these claims are in condition for allowance. Also, Applicant respectfully submits that Maruyama and Taira '189 (alone or in combination) do not show or suggest the additional claimed features of the present invention as recited in Claims 2, 4-9, 11-12 and 14 dependent on Claim 1, Claims 16-22 and 24-25 dependent on Claim 15, and Claims 29-32

dependent on Claim 27, and that these claims are in condition for allowance as being dependent on allowable base claims.

Claims 3 and 28 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Maruyama in view of Taira '189 and further in view of Taira ("Taira '098," US 6,415,098). The Applicant has reviewed these references and respectfully submits that the present invention as recited in Claims 3 and 28 is not anticipated nor rendered obvious by Maruyama, Taira '189 and Taira '098, alone or in combination.

Claim 3 is dependent on independent Claim 1, and Claim 28 is dependent on independent Claim 27. As described above, Applicant respectfully submits that Maruyama and Taira '189, alone or in combination, do not show or suggest the present claimed invention as recited by independent Claims 1 and 27.

Applicant respectfully submits that Taira '098 does not overcome the shortcomings of Maruyama and Taira '189. Taira '098, alone or in combination with Maruyama and Taira '189, also does not show or suggest a unique object identifier that is unique across a plurality of mass storage units (or devices) as recited by independent Claims 1 and 27. Accordingly, Applicant respectfully submits that Maruyama, Taira '189 and Taira '098, alone or in combination, do not show or suggest the present claimed invention as recited by independent Claims 1 and 27, and that these claims are in condition for allowance. Therefore, Applicant respectfully submits that Maruyama, Taira '189 and Taira '098 (alone or in combination) also do not show or suggest the additional claimed features of

the present invention as recited in Claims 3 and 28, and that these claims are in condition for allowance as being dependent on allowable base claims.

Claims 10, 13, 23 and 26 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Maruyama in view of Taira '189 and further in view of Nakatani et al. ("Nakatani;" US 6,370,325). The Applicant has reviewed these references and respectfully submits that the present invention as recited in Claims 10, 13, 23 and 26 is not anticipated nor rendered obvious by Maruyama, Taira '189 and Nakatani, alone or in combination.

Claims 10 and 13 are dependent on independent Claim 1, and Claims 23 and 26 are dependent on independent Claim 15. As described above, Applicant respectfully submits that Maruyama and Taira '189, alone or in combination, do not show or suggest the present claimed invention as recited by independent Claims 1 and 15.

Applicant respectfully submits that Nakatani does not overcome the shortcomings of Maruyama and Taira '189. Nakatani, alone or in combination with Maruyama and Taira '189, also does not show or suggest a unique object identifier that is unique across a plurality of mass storage units (or devices) as recited by independent Claims 1 and 15. Accordingly, Applicant respectfully submits that Maruyama, Taira '189 and Nakatani, alone or in combination, do not show or suggest the present claimed invention as recited by independent Claims 1 and 15, and that these claims are in condition for allowance. Therefore, Applicant respectfully submits that Maruyama, Taira '189 and Nakatani (alone or in combination) also do not show or suggest the additional claimed features of

the present invention as recited in Claims 10, 13, 23 and 26, and that these claims are in condition for allowance as being dependent on allowable base claims.

### CONCLUSION

In light of the above remarks, Applicant respectfully requests reconsideration of the rejected Claims.

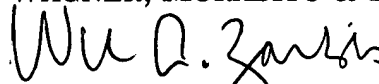
Based on the arguments presented above, Applicant respectfully asserts that Claims 1-32 overcome the rejections of record and, therefore, Applicant respectfully solicits allowance of these Claims.

Applicant has reviewed the references that were cited but not relied upon. Applicant did not find these references to show or suggest the present claimed invention: US 6,067,282 and US 6,289,166.

The Examiner is invited to contact Applicant's undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted,

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VERSION WITH MARKINGS TO SHOW CHANGES MADE

IN THE CLAIMS

Please enter the following amendments:

1. (Once Amended) In a mass storage [unit] device, a method for organizing and accessing stored data representing audio and visual data, said method comprising the steps of:
  - a) associating an object with said stored data;
  - b) deriving a unique object identifier for said object and assigning said unique object identifier to said object, wherein said unique object identifier is [not based on a physical location of said stored data within said mass storage unit] unique across a plurality of mass storage devices;
  - c) maintaining said object in a hierarchical organization with other objects, wherein said hierarchical organization comprises an object list, said object list containing said unique object identifier and other unique object identifiers for said other objects; and
  - d) accessing said object using said unique object identifier.
2. (Once Amended) The method of Claim 1 wherein step b) comprises the step of using an embedded system of said mass storage [unit] device to derive and assign said unique object identifier.
3. (Once Amended) The method of Claim 1 wherein step b) comprises the step of including in said unique object identifier a date and time corresponding to when said unique object identifier is derived such that said

unique object identifier is unique to said mass storage [unit] device.

4. (Once Amended) The method of Claim 2 wherein step b) further comprises the step of including in said unique object identifier an identification number unique to said mass storage unit such that said unique object identifier is unique for [a] said plurality of mass storage [units] devices.

5. (Once Amended) The method of Claim 1 wherein step c) further comprises the step of creating a table of contents containing a list of objects associated with data stored on said mass storage [unit] device.

14. (Once Amended) The method of Claim 1 wherein said mass storage [unit] device is a magnetic disk device.

15. (Once Amended) A mass storage unit comprising:  
medium for storing data representing audio and visual content;  
a head positioned adjacent to a surface of said medium such that said data are read to and written from said surface using said head; and  
a microcontroller for controlling movement of said head;  
wherein said microcontroller is for associating an object with said data, deriving a unique object identifier for said object, assigning said unique object identifier to said object and for accessing said object using said unique object identifier, wherein said unique object identifier is [not based on a physical location of said stored data within said mass storage unit] unique across a plurality of mass storage units;

wherein said microcontroller is also for maintaining said object in a



hierarchical organization with other objects, said hierarchical organization including an object list containing said unique object identifier and other unique object identifiers for said other objects, said other unique object identifiers also unique across said plurality of mass storage units.

17. (Once Amended) The mass storage unit of Claim 16 wherein said unique object identifier includes an identification number unique to said mass storage unit such that said unique object identifier is unique for [a] said plurality of mass storage units.

27. (Once Amended) A mass storage unit comprising:  
a storage means for storing data;  
a data transfer means positioned adjacent to said storage means for reading and writing said data from and to said storage means; and  
a microcontroller means for controlling movement of said data transfer means;  
wherein said microcontroller means is for associating an object with said data, deriving a unique object identifier for said object, assigning said unique object identifier to said object, and accessing said object using said unique object identifier, wherein said unique object identifier is [not based on a physical location of said stored data within said mass storage unit] unique across a plurality of mass storage units;

wherein said microcontroller means is also for maintaining said object in a hierarchical organization with other objects, said hierarchical organization including an object list containing said unique object identifier and other unique object identifiers for said other objects, said other unique object identifiers also

unique across said plurality of mass storage units.

28. (Once Amended) The mass storage unit of Claim 27 wherein said unique object identifier includes a date and time corresponding to when said unique object identifier is derived and an identification number unique to said mass storage [unitincludes] unit such that said unique object identifier is unique for [a] said plurality of mass storage units.